

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

ROSS WEINGARTEN (NYBN 5236401)
CHRISTIAAN HIGHSMITH (CABN 296282)
ANDREW F. DAWSON (CABN 264421)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7019
FAX: (415) 436-7234
andrew.dawson@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 20-249 RS (LB)
)	
Plaintiff,)	STATUS REPORT RE: PROOF OF SERVICE AND
)	ABRAMOFF PRIVILEGE LOG
v.)	
)	
MARCUS ANDRADE,)	
)	
Defendant.)	
)	

On April 6, 2023, the Honorable Laurel Beeler held a hearing on defendant’s motions to compel. Dkt. 163. During the hearing and in the Court’s subsequent Discovery Order, the Court ordered the government to produce non-privileged documents from the image of Jack Abramoff’s cell phone containing the search term “Robert Abramoff.” Dkt. 163 & 165. During the hearing, the Court ordered the production of a privilege log documenting the privileged Robert Abramoff documents contained on Jack Abramoff’s cell phone on or before Friday, April 14, 2023. The Court also ordered the government to serve a copy of its Discovery Order and the Court’s Standing Order on Jack Abramoff’s counsel. On April 10, 2023, the government served a copy of the Discovery Order and Standing Order on Jack Abramoff’s counsel.

1 The government has been – and continues to be – working to produce the non-privileged “Robert
2 Abramoff” documents. The government has been communicating with counsel for Jack Abramoff to
3 ensure that Mr. Abramoff can properly assert privilege over “Robert Abramoff” documents on the image
4 of his cell phone and so that he can assert personal privilege over irrelevant materials such as family
5 photographs. As set forth in the attached letter (Exhibit 1), however, Jack Abramoff’s counsel requires
6 more time to prepare a privilege log. Counsel only recently received images of the cell phone at issue.
7 Further, processing the cell phone image for privilege review will take some time, and the Sabbath and
8 Passover holidays have constrained counsel’s ability to meet the Court’s April 14, 2023, deadline for a
9 privilege review. Finally, the government has been communicating with counsel for Mr. Andrade to
10 discuss the most efficient and fastest way to produce the ordered material. Accordingly, the government
11 requests that the Court permit Jack Abramoff’s counsel an additional, reasonable amount of time to
12 prepare a privilege log for production to counsel for Mr. Andrade. The government will provide a
13 further status report to the Court once more information is known about the timeline for completion of
14 the privilege log.

15
16 DATED: April 14, 2023

Respectfully submitted,

17 ISMAIL J. RAMSEY
18 United States Attorney

19
20 /s/
21 ANDREW F. DAWSON
22 ROSS WEINGARTEN
23 CHRISTIAAN HIGHSMITH
24 Assistant United States Attorneys
25
26
27
28